

REMARKS/ARGUMENTS

In this Amendment, Applicants amended claims and cancelled non-method claims 1-9, 24, 26, and 28 from further consideration in this application. Applicants are not conceding that the subject matter encompassed by claims prior to this Amendment is not patentable over the art cited by the Examiner. Claims were amended and cancelled in this Amendment solely to facilitate expeditious prosecution of the pending claims. Applicant respectfully reserves the right to pursue claims, including the subject matter encompassed by claims, as presented prior to this Amendment and additional claims in one or more continuing applications.

Claims 30 and 31 are added.

1. Claims 10-23, 25, 27, and 29 are Patentable Over the Cited Art

The Examiner rejected claims 10-23, 25, 27, and 29 as obvious (35 U.S.C. §103(a)) over Crockett (U.S. Patent No. 5,504,861) in view of Muto (U.S. Patent No. 6,996,611) and further in view of Dias (U.S. patent No. 5,805,785). Applicants traverse with respect to the amended claims.

Amended claim 10 recites a method of managing a network of components, including storage devices and digital data processors, comprising: maintaining a first representation of a topology of the storage devices and digital data processors in the network and generating one of a first and second one of a first and second event notifications indicative of a change to the topology with respect to the network; maintaining a second representation of the topology and responding to the received first or second event notification by: accessing the first representation; determining whether there is a discrepancy between the received first or second event notification and an attribute of any of the first and second representations; and selectively disregarding the first event notification in response to determining the discrepancy with respect to the first event notification, wherein disregarding the first event notification comprises taking no action to synchronize the first and second representations in response to the first event notification; and recovering the second representation from one or more attributes of the first representation in response to determining the discrepancy with respect to the second event notification.

The added requirements to claim 10 of selectively disregarding the event notification in response to determining the discrepancy, wherein disregarding the event notification comprises

taking no action to synchronize the first and second representations in response to the first event notification and recovering the second representation from one or more attributes of the first representation in response to determining the discrepancy with respect to the second event notification are disclosed on at least pg. 95, line 4 to pg. 101, line 6 of the Specification.

The Examiner cited col. 2, lines 58-62, col. 7, lines 34-44, col. 9, line 52 to col. 10, line 9, and col. 10, line 54 to col. 11, line 37 of Crockett as teaching the requirements of pre-amended claim 10. (Fifth Office Action, pgs. 12-13) Applicants traverse with respect to the amended claim 10.

The cited col. 2 mentions that an object is to provide a design to shadow write updates at a primary site to a secondary site so that the writes to the secondary site are optimized with full recovery capabilities. The cited col. 7 mentions specific sense information from the primary storage controller regarding the failure of an I/O write operation. An I/O ERP (error recovery program) on the primary controller may perform peer-to-peer synchronization error recovery to maintain data integrity between a primary and secondary storage controller.

The cited cols. 9-10 of Crockett mention an asynchronous disaster recovery system having a primary and secondary sites. A common sysplex clock is included in the primary processor to provide a common reference to all applications. The primary controller synchronizes to a resolution appropriate to ensure differentiation between record write update times. The cited cols. 10-11 mention that the applications generate data or record updates collected by the primary storage controllers. The primary storage controllers grouped for updates provides those records to primary data mover (PDM). The PDM collects record updates and sends to system data mover (SDM).

Although the cited Crockett discusses maintaining data integrity between two sites where data is maintained, the cited Crockett nowhere teaches or suggests the specific claim requirements where the second component receives a first or second notification, and in response the second component accesses the first representation, determines a discrepancy between the received first or second event notification and an attribute of any of the first and second representations, and then selectively disregards the first event notification in response to determining the discrepancy and recovers the second representation from attributes of the first representation in response to the second event notification. Instead, the cited Crockett discusses how updates are transmitted asynchronously from a primary site to a secondary site. There is no

teaching of performing different operations with respect to discrepancies for the first and second event notifications.

Further, the cited col. 7 discusses error recovery performed at the primary controller to synchronize for an error recovery. The I/O ERP 2 is on the primary controller, see, FIG. 1. This does not teach or suggest that the second component to be updated, which the Examiner likens to the secondary site, receives a first or second event notification of a change and then performs the claimed operations of accessing the first representation, determining a discrepancy between a first or second event notification and attributes of the first and second representation, and then selectively disregarding the first event notification or recover the second representation in response to the discrepancy with respect to the second notification.

Moreover, this rejection should be withdrawn because Crockett teaches away from the claimed techniques for providing the topology changes to the second representation. Crockett mentions that the primary storage controllers each group their respective record updates for an asynchronous remote data shadowing session and provide those record updates to the PDM. Transferring record updates from the primary storage controllers is controlled by the PDM (Primary Data Mover). (Crockett, col. 10, lines 54-65). Thus, in Crockett the primary controller initiates the transferring of updates by providing the updates, whereas the claims require that the first component sends a first or second event notification to a second component that causes the second component to access the first representation at the first component and determine a discrepancy and disregard the first event notification if the discrepancy is for the first event notification and recover the second representation from attributes of the first representation in response to determining a discrepancy for the second event notification. Further, there is no teaching that disregarding the discrepancy comprises taking no action to synchronize the first and second representations in response to the first event notification.

The Examiner cited col. 4, lines 45-51 of Muto as teaching network management devices store network hierarchical information of the claimed topology. (Fifth Office Action, pg. 13) Applicants traverse.

The cited col. 4 of Muto mentions a management device storing hierarchical location information on locations of device terminals and attributes of the device terminals that correspond to the hierarchical location information. Although the cited Muto discusses maintaining information on the locations of device terminals in a network, there is no teaching or

suggestion of the claim requirement of determining a discrepancy with respect to the first and second event notifications and the first and second representations of the topology, and then performing different operations for the first and second event notifications. Instead, the cited Muto discusses storing information on the locations of device terminals.

The Examiner further cited col. 2, lines 28-33 of Dias as teaching the requirements of the claim concerning filtering events to ensure that needless events are not acted on. (Fifth Office Action, pg. 13) Applicants submit that this cited col. 2 of Dias also fails to teach the above discussed shortcomings of the above references with respect the combination of claim requirements.

The cited col. 2 of Dias mentions that events detected by monitors are sent to event handlers. The event handlers process events by filtering them through such activities as event correlation, removal of duplicate events, and rollout. Filtered events are given by event handlers to recovery drivers, which have a rule base which specifies user defined recovery programs corresponding to the events.

The cited col. 2 mentions that event handlers process events. However, as with the other cited references, nowhere does the cited col. 2 anywhere teach or suggest that in response to a first or second event notification of a change to the topology, that the notified component performs the operations of accessing the first representation, determining a discrepancy between the received first or second event notification and an attribute of the first and second representations and then selectively disregarding the first event notification if there is a discrepancy for the first event notification or recovering the second representation in response to the discrepancy for the second event notification. Nowhere does the cited col. 2's discussion of filtering teach or suggest selectively disregarding a first event notification for which a discrepancy is determined and recovering the second representation in response to the second notification and a discrepancy.

Applicants further submit that combining the different teachings of the references as the Examiner proposes does not teach or suggest the claimed combination. The proposed combination of the cited references produces a system that shadows updates between a primary site and secondary site (Crockett) with providing a notification to the nodes, having hierarchical information representing locations of the device terminals (Muto), and that event handlers are used to process events (Dias). This proposed combination nowhere teaches or suggest that the

first component sends a first or second notification to a second component that causes the second component to access the first representation at the first component, determine a discrepancy and disregard the first event notification if there is a discrepancy with the first event notification and recover the second representation from attributes of the first representation in response to determining the discrepancy for the second notification . Further, there is no teaching in this proposed combination that disregarding the discrepancy comprises taking no action to synchronize the first and second representations in response to the first event notification as claimed.

Accordingly, amended claim 10 is patentable over the cited art because the cited combination of Crockett, Muto and Dias do not teach or suggest all the claim requirements.

Amended claims 11-23, 25, 27, and 29 are patentable over the cited art because they depend from claim 10, which is patentable over the cited art for the reasons discussed above. Moreover, the following discussed dependent claims provide additional grounds of patentability over the cited art.

Applicants amended the dependent claims 12-23, 25, 27, and 29 to clarify that the event notification that is disregarded comprises the “first event notification” and the event notification that results in the recovery operation comprises the “second event notification” to conform to the antecedent basis provided for the first and second event notifications in base claim 10. These amendments are disclosed on pgs. 95-95 of the Specification.

Claim 11 depends from claim 10 and further requires that the recovering operations include at least one of the operations comprising: clearing the second representation and rebuilding that representation from attributes of the first representation; comparing the first and second representations in whole or in part, and copying from the first representation to the second representation attributes missing from the latter, while any of deleting or marking as missing attributes in the second representation indicative of components present in the second representation but not in the first representation; and copying from the first representation to the second representation one or more attributes indicative of any of (a) a component or relationships represented by an attribute in connection with which the discrepancy occurred, and (b) a component or relationship in a region represented by an attribute in connection with which the discrepancy occurred.

The Examiner cited the above discussed sections of Crockett as disclosing the additional requirements of claim 7. (Fifth Office Action, pg. 6- 7) Applicants traverse.

As discussed, the above cited Crockett discusses how to mirror updates to a primary site to a secondary site. The Examiner argues that hosts updating against one another to provide full recovery capabilities teaches the claim requirements. However, the Examiner has not cited any part of Crockett that teaches or suggests the specific claimed functionality that recovers the second representation by performing at least one of the following operations: i) clearing the second representation and rebuilding that representation from attributes of the first representation; ii) comparing the first and second representations in whole or in part, and copying from the first representation to the second representation attributes missing from the latter, while any of deleting or marking as missing attributes in the second representation indicative of components present in the second representation but not in the first representation; and iii) copying from the first representation to the second representation one or more attributes indicative of any of (a) a component or relationships represented by an attribute in connection with which the discrepancy occurred, and (b) a component or relationship in a region a component or relationships represented by an attribute in connection with which the discrepancy occurred.

In the cited sections of Crockett there is no mention or disclosure of the above discussed functionality to handle a discrepancy between an event notification concerning a change to a network topology and the first or second representations of that topology as claimed.

Accordingly, the additional requirements of claim 11 provide further grounds of patentability over the cited art because the additional requirements of claim 11 are not taught or suggested in the cited combination of Crockett, Muto, and Dias.

Amended claim 12 depends from claim 10 and further recites that determining the discrepancy that results in selectively disregarding the first event notification comprises determining the first event notification indicative of addition of a new component to the topology and an attribute of the first representation indicative of absence of the new component.

The Examiner cited col. 9, line 52 to col. 10, line 9; col. 10, line 54 to col. 11, line 37 of Crockett as teaching the additional requirements of pre-amended claim 12. (Fifth Office Action, pg. 14). Applicants traverse with respect to the amended claim 12, which as amended clarifies that the event notification comprises the first event notification.

The cited cols. 9-10 discuss how applications at the primary site synchronize to a sysplex clock, and the cited cols. 10-11 discuss how record updates are gathered at the primary controllers and sent to the secondary site. Nowhere do these cited sections of Crockett anywhere teach or suggest determining the discrepancy that results in selectively disregarding the first event notification by determining the first event notification indicative of addition of a new component to the topology and an attribute of the first representation indicative of absence of the new component. For instance, nowhere does the cited Crockett teach or suggest that the primary controller provide a first event notification indicating a change to a topology of adding a component when a representation of the topology maintained by the primary controller indicates an absence of the component. Not only does the cited Crockett have no mention of a topology, but there is no mention of the claimed first and second event notifications.

Accordingly, amended claim 12 provides additional grounds of patentability over the cited art because the cited art fails to teach to suggest all the additional requirements of amended claim 12.

Amended claim 13 depends from claim 10 and further requires that the second event notification is indicative of addition of a new component to the topology and an attribute of the first representation indicative of absence of the new component and further comprising: determining whether the new component is in the second representation in response to determining that the new component is absent from the first representation and updating the second representation to indicate that component's status is suspect in response to determining that the new component is in the second representation.

The Examiner cited col. 2, lines 58-62, col. 7, lines 34-44, col. 9, line 52 to col. 10, line 9, and col. 10, line 54 to col. 11, line 37 of Crockett as teaching the additional requirements of pre-amended claim 13. (Fifth Office Action, pgs. 14-15) Applicants traverse with respect to the amended claim 13, which as amended clarifies that the event notification comprises the second event notification.

The cited col. 2 mentions that an object is to provide a design to shadow write updates at a primary site to a secondary site so that the writes to the secondary site are optimized with full recovery capabilities. The cited col. 7 mentions specific sense information from the primary storage controller regarding the failure of an I/O write operation. An I/O ERP (error recovery program) on the primary controller may perform peer-to-peer synchronization error recovery to

maintain data integrity between a primary and secondary storage controller. The cited cols. 9-10 discuss how applications at the primary site synchronize to a sysplex clock, and the cited cols. 10-11 discuss how record updates are gathered at the primary controllers and sent to the secondary site.

Nowhere do these cited sections of Crockett anywhere teach or suggest that the second event notification is indicative of the addition of a new component to the topology and an attribute of the first representation is indicative of absence of the new component, and determining whether the new component is in the second representation in response to determining that the new component is absent from the first representation; and updating the second representation to indicate that component's status is suspect in response to determining that the new component is in the second representation.

For instance, nowhere does the cited Crockett teach or suggest that the primary controller provide a second event notification indicating addition of a new component to the topology when the first representation of the topology maintained by the primary controller indicates an absence of the component, and then a determination is made as to whether the new component is in the second representation at the secondary site when the new component is in the first representation of the topology at the primary controller. Not only does the cited Crockett have no mention of a topology, but there is no mention of the claimed event notification and determinations of whether the new component is indicated in representations of the topology at the primary and secondary controllers of Crockett.

Accordingly, amended claim 13 provides additional grounds of patentability over the cited art because the cited art fails to teach to suggest all the additional requirements of amended claim 13.

Amended claim 15 depends from claim 10 and further recites that determining the discrepancy that results in selectively disregarding the first event notification comprises determining the first event notification indicative of addition of a relationship between components of the topology and an attribute of the first representation indicative of absence of that relationship.

The Examiner cited col. 7, lines 34-44, col. 9, line 52 to col. 10, line 9, and col. 10, line 54 to col. 11, line 37 of Crockett as teaching the additional requirements of pre-amended claim

15. (Fifth Office Action, pg.16) Applicants traverse with respect to the amended claim 15, which as amended clarifies that the event notification comprises the first event notification..

The cited col. 7 mentions specific sense information from the primary storage controller regarding the failure of an I/O write operation. An I/O ERP (error recovery program) on the primary controller may perform peer-to-peer synchronization error recovery to maintain data integrity between a primary and secondary storage controller. The cited cols. 9-10 discuss how applications at the primary site synchronize to a sysplex clock, and the cited cols. 10-11 discuss how record updates are gathered at the primary controllers and sent to the secondary site.

Nowhere do these cited sections of Crockett anywhere teach or suggest disregarding the first event notification when the first event notification is indicative of addition of a relationship between components of the topology and an attribute of the first representation indicative of absence of that relationship. For instance, nowhere does the cited Crockett teach or suggest that the primary controller provide the first event notification indicating addition of a new relationship of components in the topology when the first representation of the topology maintained by the primary controller indicates an absence of the relationship. Not only does the cited Crockett have no mention of a topology, but there is no mention of the claimed first event notification and determinations of whether the new component is indicated in a representation of the topology at the primary controller of Crockett.

Accordingly, amended claim 15 provides additional grounds of patentability over the cited art because the cited art fails to teach to suggest all the additional requirements of amended claim 15.

Amended claim 16 depends from claim 10 and further recites determining the discrepancy that results in performing the recovery operation on the second representations comprises determining the second event notification indicative of addition of a relationship between components of the topology and an attribute of the second representation indicative of the presence of that relationship.

The Examiner cited col. 9, line 52 to col. 10, line 9, and col. 10, line 54 to col. 11, line 37 of Crockett as teaching the additional requirements of pre-amended claim 16. (Fifth Office Action, pgs. 16-17) Applicants traverse with respect to the amended claim 16, which as amended clarifies that the event notification comprises the second event notification.

The cited cols. 9-10 discuss how applications at the primary site synchronize to a sysplex clock, and the cited cols. 10-11 discuss how record updates are gathered at the primary controllers and sent to the secondary site.

Nowhere do these cited sections of Crockett anywhere teach or suggest the discrepancy that results in performing the recovery operation on the second representations comprises determining the second event notification indicative of addition of a relationship between components of the topology and an attribute of the second representation indicative of the presence of that relationship.

For instance, nowhere does the cited Crockett teach or suggest that the primary controller provide the second event notification indicating addition of a new relationship between components in the topology when the second representation of the topology maintained by the secondary controller indicates a presence of that relationship. Not only does the cited Crockett have no mention of a topology, but there is no mention of the claimed second event notification and determinations of whether the new component is indicated in a representation of the topology at the secondary controller of Crockett.

Accordingly, amended claim 16 provides additional grounds of patentability over the cited art because the cited art fails to teach to suggest all the additional requirements of amended claim 16.

Amended claim 17 depends from claim 10 and further recites that determining the discrepancy that results in selectively disregarding the first event notification comprises determining first event notification indicative of addition of a relationship between components of the topology and an attribute of the second representation indicative of the absence from the topology of one of the components to that relationship.

The Examiner cited col. 7, lines 34-44, col. 9, line 52 to col. 10, line 9, and col. 10, line 54 to col. 11, line 37 of Crockett as teaching the additional requirements of pre-amended claim 17. (Fifth Office Action, pg. 17) Applicants traverse with respect to the amended claim 17, which as amended clarifies that the event notification comprises the first event notification..

The cited col. 7 mentions specific sense information from the primary storage controller regarding the failure of an I/O write operation. An I/O ERP (error recovery program) on the primary controller may perform peer-to-peer synchronization error recovery to maintain data integrity between a primary and secondary storage controller. The cited cols. 9-10 discuss how

applications at the primary site synchronize to a sysplex clock, and the cited cols. 10-11 discuss how record updates are gathered at the primary controllers and sent to the secondary site.

Nowhere do these cited sections of Crockett anywhere teach or suggest disregarding the first event notification when the first event notification is indicative of addition of a relationship between components of the topology and an attribute of the second representation indicative of the absence from the topology of one of the components to that relationship.

For instance, nowhere does the cited Crockett teach or suggest that the secondary controller disregard the first event notification from the primary controller indicating of a new relationship in the topology when the first event notification indicates the addition of the new relationship and the second representation of the topology at the secondary controller does not indicate the relationship. Not only does the cited Crockett have no mention of a topology, but there is no mention of disregarding a first and second event notifications as claimed.

Accordingly, amended claim 17 provides additional grounds of patentability over the cited art because the cited art fails to teach to suggest all the additional requirements of claim 17.

Amended claim 19 depends from claim 10 and further recites that determining the discrepancy that results in performing the recovery operation on the second representations comprises determining the second event notification indicative of modification of an attribute of a component of the topology and an attribute of the second representation indicating presence of representation of that component in the second representation but its absence from the topology.

The Examiner cited col. 7, lines 34-44, col. 9, line 52 to col. 10, line 9, and col. 10, line 54 to col. 11, line 37 of Crockett as teaching the additional requirements of pre-amended claim 19. (Fifth Office Action, pg. 18) Applicants traverse with respect to the amended claim 19, which as amended clarifies that the event notification comprises the second event notification..

The cited col. 7 mentions specific sense information from the primary storage controller regarding the failure of an I/O write operation. An I/O ERP (error recovery program) on the primary controller may perform peer-to-peer synchronization error recovery to maintain data integrity between a primary and secondary storage controller. The cited cols. 9-10 discuss how applications at the primary site synchronize to a sysplex clock, and the cited cols. 10-11 discuss how record updates are gathered at the primary controllers and sent to the secondary site.

Nowhere do these cited sections of Crockett anywhere teach or suggest performing a recovery when the second event notification indicates a modification of a component of the

topology that is indicated in the second representation but is indicated as absent from the topology.

For instance, nowhere does the cited Crockett teach or suggest that the secondary controller perform a recovery on a second representation of a topology at the secondary controller for the second event notification that indicates a modification of an attribute, where the second representation at the secondary controller indicates a presence of the component but its absence from the topology. Not only does the cited Crockett have no mention of a topology, but there is no mention of performing a recovery as claimed.

Accordingly, amended claim 19 provides additional grounds of patentability over the cited art because the cited art fails to teach to suggest all the additional requirements of claim 19.

Amended claim 20 depends from claim 10 and further recites that determining the discrepancy that results in selectively disregarding the first event notification comprises determining the first event notification indicative of a missing component of the topology and an attribute of the second representation indicative of the absence of that component from the topology.

The Examiner cited col. 7, lines 34-44, col. 9, line 52 to col. 10, line 9, and col. 10, line 54 to col. 11, line 37 of Crockett as teaching the additional requirements of pre-amended claim 20. (Fifth Office Action, pgs.18-19) Applicants traverse with respect to the amended claim 20, which as amended clarifies that the event notification comprises the first event notification..

The cited col. 7 mentions specific sense information from the primary storage controller regarding the failure of an I/O write operation. An I/O ERP (error recovery program) on the primary controller may perform peer-to-peer synchronization error recovery to maintain data integrity between a primary and secondary storage controller. The cited cols. 9-10 discuss how applications at the primary site synchronize to a sysplex clock, and the cited cols. 10-11 discuss how record updates are gathered at the primary controllers and sent to the secondary site.

Nowhere do these cited sections of Crockett anywhere teach or suggest disregarding an event notification when the notification indicates a missing component of the topology.

For instance, nowhere does the cited Crockett teach or suggest that the secondary controller disregard an event notification indicating a missing component of the topology. Not only does the cited Crockett have no mention of a topology, but there is no mention of performing a recovery as claimed.

Accordingly, amended claim 20 provides additional grounds of patentability over the cited art because the cited art fails to teach to suggest all the additional requirements of claim 15.

Amended claims 21, 22 and 23 also recite selectively disregarding the first event notification indicative of a missing component or relationship. Applicants submit that these claims are patentable over the cited art for the reasons discussed with respect to claim 20.

Amended claim 25 depends from claim 10 and further require that the recovering of the second representation is performed in response to the determined discrepancy comprising the first representation not reflecting the change indicated by the second event notification and the second representation reflecting the change indicated by the second event notification.

The Examiner cited claims 5, 7, and 8 of Dias as teaching the additional requirements of the pre-amended claim 25. (Fifth Office Action, pg. 20) Applicants traverse with respect to the amended claim 25, which as amended clarifies that the event notification comprises second event notification..

The cited claim 5 mentions that failure events are reported to an event manager and that the event manager reports only selected ones of the events based on a filtering criteria. The cited claim 7 mentions monitoring nodes of a distributed system and subsystems, reporting detected events, filtering the events, and applying rules to filtered events to select a user defined recovery program. The cited claim 8 mentions that the filtering includes at least one of event correlation, removal of duplicate events, and rollop.

Although the cited claims of Dias mention filtering events and performing a recovery action based upon certain rules being applied to the events, nowhere do the cited claims of Dias anywhere teach or suggest the specific claim requirements of recovering the second representation in response to the determined discrepancy comprising the first representation not reflecting the change indicated by the second event notification and the second representation reflecting the change indicated by the event notification.

Accordingly, amended claim 25 is patentable over the cited art because the requirements of these claims are not taught or suggested in the cited Dias or other cited art.

Amended claim 27 depends from claim 10 and further requires that the first event notification is disregarded in response to the determined discrepancy comprising the first representation and second representation not reflecting the change indicated by the first event notification.

The Examiner discussed the above discussed claims 5, 7, and 8 of Dias as teaching the additional requirements of the pre-amended claim 27. (Fifth Office Action, pg. 21) Applicants traverse with respect to the amended claim 27, which as amended clarifies that the event notification comprises the first event notification..

Although the cited claims of Dias mention filtering events and performing a recovery action based upon certain rules being applied to the events, nowhere do the cited claims of Dias anywhere teach or suggest the specific claim requirements that the first event notification is disregarded in response to the determined discrepancy comprising the first representation and second representation not reflecting the change indicated by the first event notification. Nowhere is there any teaching of the claim requirement of disregarding a first event notification if the first representation and second representation do not reflect the change indicated by the first event notification.

Accordingly, amended claim 27 is patentable over the cited art because the requirements of these claims are not taught or suggested in the cited Dias or other cited art.

Claim 29 depends from claim 10 and further requires that the second event notification indicates that a device was added to the first representation, wherein the recovering of the second representation is performed in response to the determined discrepancy comprising the first representation not reflecting the added device and the second representation reflecting the added device, and wherein the first event notification is disregarded in response to the determined discrepancy comprising the first representation and the second representation not reflecting the added device.

The Examiner discussed the above discussed claims 5, 7, and 8 of Dias as teaching the additional requirements of pre-amended claim 29. (Fifth Office Action, pg. 21) Applicants traverse with respect to the amended claim 29, which as amended clarifies that the event notification comprises a first and second event notifications.

Although the cited claims of Dias mentions filtering events and performing a recovery action based upon certain rules being applied to the events, nowhere do the cited claims of Dias anywhere teach or suggest the specific claim requirements of recovering the second representation if the first representation does not reflect the added device and the second representation reflects the added device, and disregarding the second event notification if the first representation and the second representation do not reflect the added device.

Accordingly, claim 29 is patentable over the cited art because the additional requirements of these claims are not taught or suggested in the cited Dias or other cited art.

2. Added Claims 30 and 31

Added claims 30 and 31 include the requirements of amended claim 10. Claim 30 further includes the requirements of canceled claim 8 concerning the determined discrepancies that result in disregarding the first event notification and claim 31 further includes the requirements of canceled claim 9 concerning the determined discrepancies that result in the recovering of the second representation.

Claims 30 and 31 are patentable over the cited art because they include the requirements of amended claim 10, which distinguish over the cited art for the reason discussed above and because of the additional requirements of canceled claims 8 and 9 added to claims 30 and 31, respectively.

Conclusion

For all the above reasons, Applicant submits that the pending claims 10-23, 25, 27, and 29-31 are patentable over the art of record. Should any additional fees be required, please charge Deposit Account No. 09-0466.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: July 13, 2008

By: /David Victor/

David W. Victor
Registration No. 39,867

Please direct all correspondences to:

David Victor
Konrad Raynes & Victor, LLP
315 South Beverly Drive, Ste. 210
Beverly Hills, CA 90212
Tel: 310-553-7977
Fax: 310-556-7984